

Tracy Hope Davis
United States Trustee for Region 2
Office of the United States Trustee
271 Cadman Plaza East, Room 4529
Brooklyn, New York 11201
Telephone: (718) 422-4960
William E. Curtin (WC-1974)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

USA UNITED FLEET INC.,
a/k/a SHORELINE FLEET, INC.

Hearing Date: TBD
Hearing Time: TBD

Case No. 11-45867 (JF)

Chapter 11

Debtor.

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In re

USA UNITED HOLDINGS INC.,
a/k/a SHORELINE MERGE, INC.

Case No. 11-45868 (JF)

Chapter 11

Debtor.

-----X

In re

Case No. 11-45869 (JF)

Chapter 11

Debtor.

-----X

In re

Case No. 11-45872 (JF)

Chapter 11

Debtor.

-----X

In re

Case No. 11-45873 (JF)

Chapter 11

Debtor.

-----X

-----X
In re USA UNITED TRANSIT INC.,
A/k/a SHORELINE PUPIL TRANSIT, INC. Case No. 11-45875 (JF)
Debtor.
-----X
In re TOM TOM ESCORTS ONLY, INC., Chapter 11
Debtor.
-----X
In re SHORELINE TRANSIT INC., Chapter 11
Debtor.
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PLEASE TAKE NOTICE that upon the within motion and concurrently filed memorandum of law and declaration, Tracy Hope Davis, the United States Trustee for the Eastern District of New York (the “United States Trustee”) will move before the Honorable Jerome Feller, United States Bankruptcy Judge, in the United States Bankruptcy Court, 271 Cadman Plaza East, Brooklyn, New York, **at a date and time to be determined**, or as soon thereafter as counsel can be heard, for entry of an order directing conversion of this case to chapter 7 and for such other and further relief as this Court may deem just and proper.

WHEREFORE, the United States Trustee respectfully requests that this Court enter an order converting these cases to chapter 7 or grant such other relief as the Court deems just, fair, and equitable.

Dated: Brooklyn, New York
July 20, 2011

TRACY HOPE DAVIS
UNITED STATES TRUSTEE
FOR REGION 2

By: /s/ William E. Curtin
William E. Curtin (WC-1974)
Trial Attorney
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